

Exhibit A

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-130-S

IN RE: Joint Application for Approval of)	SOUTH CAROLINA OFFICE OF
the Sale of Assets and Transfer of)	REGULATORY STAFF'S FIRST AND
Facilities, Territory, and Certificate of)	CONTINUING REQUEST FOR
Public Convenience and Necessity from)	BOOKS, RECORDS, AND OTHER
Synergy Utilities, L.P to South Carolina)	INFORMATION
Water Utilities, Inc.)	
)	

TO: CHARLES L.A. TERRENI, ESQUIRE AND SCOTT ELLIOTT, ESQUIRE,
COUNSEL FOR SYNERGY UTILITIES, L.P. AND SOUTH CAROLINA WATER
UTILITIES, INC.

I. INSTRUCTIONS

The South Carolina Office of Regulatory Staff ("ORS") hereby requests pursuant to S.C. Code Ann. §§ 58-4-55 and 58-5-230 that Synergy Utilities, L.P ("Synergy") and South Carolina Water Utilities, Inc. ("SCWU") ("collectively the Joint Applicants") provide responses in writing, electronically where required, and serve the undersigned by **May 26, 2021**, to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these requests, "address" means mailing address and business address.

When asked to identify or provide a document, “identify” and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word “document” is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUIRED:

- Pursuant to S.C. Code Ann. § 58-4-55(A), that responses be submitted under oath.
- In addition to the signature and verification at the close of the responses, the witness(es), employee(s), contractor(s), or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- All information provided shall be provided in electronic form only unless otherwise requested. All information available in Excel spreadsheets shall be provided in Excel. All Excel spreadsheets shall be working copies with all formulas, links, and calculations intact.
- All electronic documents provided must be provided in native file format with all formulas, links, and calculations intact. Responses containing .pdf documents must be searchable. Each electronic file must be clearly marked with the Response number.
- Any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Kyle D. Maurer Sr., PhD, P.E. [803.737.0959], Daniel P. Hunnell [803.737.0780], Benjamin P. Mustian, Esquire [803.737.0898] or Alexander W. Knowles, Esquire [803.737.0889] of ORS.
- That the responses be sent electronically to Kyle D. Maurer Sr., PhD, P.E. at kmaurer@ors.sc.gov, Daniel P. Hunnell at dhunnell@ors.sc.gov, Benjamin P. Mustian,

Esquire at bmustian@ors.sc.gov, and Alexander W. Knowles, Esquire at aknowles@ors.sc.gov.

- That this entire list of requests be reproduced and included in front of each set of responses.
- If the response to any request is that the information requested is not currently available, please advise ORS and state when the information requested will be available and provided to the ORS. This statement is not a waiver of the deadline for all other responses.
- This request is continuing and requires the Company to supplement or amend its responses as any additional information becomes available.
- For every page produced to ORS that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which the Company designates as confidential information must also be marked by notation, highlighting, or other conspicuous means.
- The following definitions shall apply:
 - a. Goodwill. Goodwill is an asset representing the future economic benefits arising from other assets acquired in a business combination that are not individually identified and separately recognized. The terms "goodwill" and "acquisition premium" are used interchangeably for ratemaking purposes and for the purposes of this request.
 - b. Transaction costs. Transaction costs include any costs incurred in connection with completion of the acquisition of Synergy and/or its assets, facilities, territory, and Certificate of Public Convenience and Necessity by SCWU including the costs of obtaining all necessary regulatory approvals for the sale and any payments identified in the Agreement. Examples of such costs include, but are not limited to, legal fees and expenses, regulatory filing fees, costs of developing and pursuing regulatory approvals, accounting fees, interest, prepayment penalties, financial advisory fees, and banking fees.
 - c. Transition costs. Transition costs are generally costs arising from the activities necessary to integrate the purchased entity into the acquiring entity. Examples of transition costs include but are not limited to, those costs related to the integration of financial, IT, human resource, billing, accounting, and telecommunications systems and processes. Other examples of costs may include, but are not limited to, severance payments to employees, costs related to changes to signage, the cost of transitioning employees to post-merger employee benefit plans, legal fees, and expenses related to the resolution of the NPDES permit for Raintree Acres (SC0039055) and wholesale wastewater treatment agreement with City of Orangeburg Department of Public Utilities ("Orangeburg DPU"), and termination of any duplicative leases, contracts, operations.

II. REQUESTS

Questions about SCWU and SouthWest Water Company ("SWWC")

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1-8 [REDACTED]

Surrebuttal Exhibit DMH-1
Page 6 of 85

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1-13 [REDACTED]

In the last ten years, SWWC and/or its subsidiaries have completed the following asset acquisitions, equity acquisitions, and mergers in the State of South Carolina. Settlement documents and Commission orders may be found on the Commission's docket management page for those respective dockets. Please see also response to Request No. 1.

ACQUIREE	ACQUIROR	TYPE	DOCKET	ORDER
Kiawah Island Utility, Inc.	South Carolina Utility Systems, Inc.	Equity	N/A	N/A
CUC, Inc.	South Carolina Water Utilities-CUC, Inc.	Asset	2020-225-WS	2021-93
T.J. Barnwell Utility, Inc.	South Carolina Water Utilities, Inc.	Asset	2019-318-S	2020-35
Harbor Island Utilities, Inc.	South Carolina Water Utilities, Inc.	Asset	2019-319-WS	2020-36
Ni South Carolina Utilities, Inc.*	South Carolina Utility Systems, Inc.	Equity	N/A	N/A
Ni America Operating LLC	South Carolina Utility Systems, Inc.	Equity	N/A	N/A
Ni South Carolina LLC.**	South Carolina Utility Systems, Inc.	Equity	N/A	N/A

*Includes the subsidiaries 1710 Woodcreek Farms, LLC and Palmetto Utilities, Inc.

**Includes the subsidiaries Ni SC Environmental Services LLC and Palmetto Wastewater Reclamation LLC.

-Brian Bahr

- 1-14 For each merger or asset acquisition listed in response to 1-13, please identify and explain any objective or quantifiable benefits realized by customers as a result of the acquisition. Please explain each answer and provide supporting information to quantify the service improvement, reduced utility costs, and/or savings to customers. In answering the question take into consideration if the acquired utility possessed the financial and/or managerial ability to improve their performance without the acquisition taking place.

SCWU objects to this request on the grounds that it is arbitrary, capricious, unnecessary, unduly burdensome, or unrelated to the regulated operations of a public utility. The request extends to SWWC's relationships with numerous regulated and unregulated subsidiaries in multiple states other than South Carolina. Subject to this objection, SCWU responds as follows.

The asset acquisitions listed in response to ORS Request No. 1-13 were found by the Commission to be in the public interest; the records in each of those cases support the Commission's findings regarding benefits to customers, including service enhancements, improved quality of service, and economies of scale. The equity acquisitions listed above were not subject to Commission jurisdiction, but generally provided customers analogous benefits to those of the asset acquisitions.

-Brian Bahr

Questions about the Joint Application

1-15 Paragraphs 10 and 16 of the Joint Application state that “[c]ustomers will not be materially affected by the transaction ...” and that “it is in the public interest that the Agreement be approved.” For each merger or asset acquisition that SWWC or its subsidiaries completed in the past ten (10) years, advise if SWWC or its subsidiaries made similar claims in filings with any state commission for approval of the acquisition. For each such merger or asset acquisition:

- a. Provide a detailed cost study or other analysis that the customers of those acquired utilities were not materially affected.

SCWU objects to this request on the grounds that it is arbitrary, capricious, unnecessary, unduly burdensome, or unrelated to the regulated operations of a public utility. The request extends to SWWC’s relationships with numerous regulated and unregulated subsidiaries in multiple states other than South Carolina. Subject to this objection, SCWU responds as follows.

All cost studies or analyses used by the Commission to support its determinations that the asset acquisitions listed in response to ORS Request No. 1-13 were in the public interest and that customers would not be materially affected by the transaction would have been included in the respective evidentiary records of those cases; please refer to the case records of those dockets. The equity transactions listed above were not subject to Commission jurisdiction; nevertheless, competitive benefits similar to asset sales are expected to be achieved.

- b. If no cost study or other analysis exists, provide a detailed explanation as to how SCWU supports the statement customers will not be materially affected by the transaction in this filing.

All cost studies or analyses used by the Commission to support its determinations that the asset acquisitions listed in response to ORS Request No. 1-13 were in the public interest and that customers would not be materially affected by the transaction would have been included in the respective evidentiary records of those cases; please refer to the case records of those dockets. Regarding the equity transactions listed in response to ORS Request No. 1-13, no cost studies or analyses were provided since Commission approval was not required; nevertheless, competitive benefits similar to asset sales are expected to be achieved.

-Brian Bahr

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[REDACTED]

[REDACTED]

1-17 [REDACTED]

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[REDACTED]

1-18 [REDACTED]

[REDACTED]

[REDACTED]

1-19 [REDACTED]

[REDACTED]

[REDACTED]

- 1-20 Please explain how SWWC, its subsidiaries, or affiliates will fund the asset acquisition. If new long-term debt will be utilized, provide the detail and status of acquiring new note(s). If equity will be utilized, provide the detail of the source of such equity.

On the closing date, the specified acquiror, SCWU, will fund the asset acquisition from a combination of existing debt and equity.

-Dan Medina

- 1-21 What cost savings and management improvements has SCWU studied, considered, or identified in connection with this acquisition? Provide all cost studies or cost analyses related to this acquisition. Provide the names of the individuals who completed such studies or analyses and identify all instructions and guidance provided to the individual(s) who completed the studies or analyses. If no cost study or analysis exists, provide a detailed explanation of why cost savings were not an aspect in determining the terms of this acquisition and the purchase price.

SCWU believes that there can be improvements in reliability and resiliency with the acquisition. Synergy customers will be served by a larger utility with scale and a significant presence in the Columbia area, resulting in more available resources to serve the utility's customers. Additionally, SCWU will offer enhanced customer service options that will improve the customer experience. There are no cost studies or cost analyses performed as a part of the acquisition. In a regulated environment, efficiencies are returned to the customers through rates over time.

-Michael Cartin

Questions about the Asset Purchase Agreement

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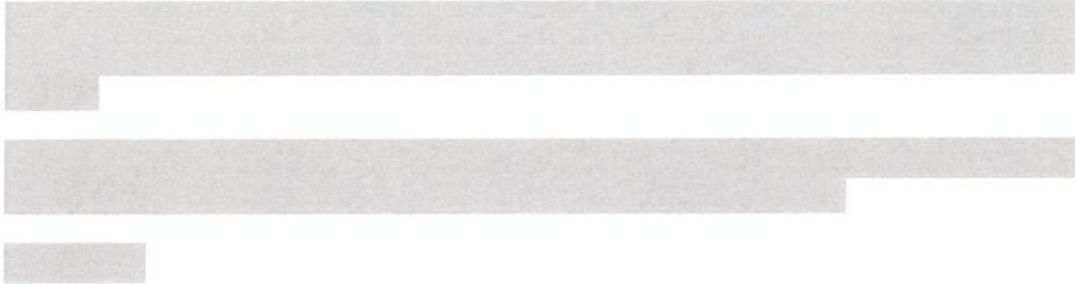
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1-37 Describe all transition costs resulting from this acquisition and provide the full level of detail presently available itemizing the amount of transition costs. In addition:

- a. Provide a detailed breakdown to itemize all estimated transition costs budgeted by SCWU.

SCWU does not have a breakdown of estimated transition costs and is not requesting any approval of transition costs as part of this proceeding.

- b. Provide the specific customer benefit associated with each category of transition costs.

Please refer to SCWU's response to ORS Request No. 1-56.

- c. If Synergy is not currently providing those benefits to its customers, please explain why not.

The software costs and human resources expenses associated with benefits listed in response to ORS Request No. 1-56 would not be a prudent investment for a company the size of Synergy.

- d. Absent the APA, would Synergy be able to provide these customer benefits at lower cost? If the answer is no, provide a detailed cost analysis or cost study that supports the answer.

The ORS is fully aware of Synergy's cost of service. At this time, Synergy's level of service is consistent with its authorized revenue. Were Synergy to attempt to provide additional customer benefits, its costs would increase, which would drive Synergy to the Commission for rate relief sooner than necessary.

- e. If the Public Service Commission of South Carolina ("Commission") today ordered Synergy to provide those benefits to its customers, would Synergy be able to provide those benefits within one (1) year? If not, provide a detailed explanation why not.

The benefits provided by SCWU are not easily replicable given the size and scope of resources available to SCWU through SWWC. Synergy cannot forecast whether it could secure the talent and necessary labor to provide. Additionally, the companies are not aware of the expense and debt service required to upgrade Synergy's IT and software programs.

-Keith Parnell & Michael Cartin

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Questions about Northwood Estates Subdivision

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1-45 Is SCWU aware of the AECOM Study¹ dated April 2017 and subsequently updated on August 19, 2019 (*see* Attachment A), which details deficiencies in the Northwood wastewater collection system and the probable costs associated to rectify those deficiencies, and the HPG Study² dated June 4, 2020 (*see* Attachment B)? If the answer is in the affirmative:

- a. Provide any cost studies or any other type of analyses SCWU or Synergy has in its possession related to the deficiencies identified in the AECOM Study.

Neither SCWU nor Synergy has such study or other type of analysis in its possession.

- b. Explain why Paragraph 10, Item (e) of the Asset Purchase Agreement does not require any repairs to the collection system that serves Northwood.

While Section 10(e) of the Asset Purchase Agreement contains a handful of discrete asset repairs that SCWU and Synergy had negotiated to be handled by Synergy at its cost prior to the closing of the asset acquisition, as part of arm's-length, good-faith negotiations, Section 10(e) was not intended to, and does not, include a comprehensive list of all repairs that may be prudent to make to Synergy's collection systems.

-Joshua Abbotoy & Keith Parnell

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¹ Titled *Sanitary Sewer System Evaluation for Northwood Estates Collection System for County of Orangeburg*.

² Titled *Synergy Utilities, LP Preliminary Cost Estimate, Sanitary Sewer System Improvement for Northwoods Estate Subdivision*.

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1-51 The letter from Scott Elliott on behalf of Synergy to W. Marshall Taylor, Jr., Acting Director of DHEC, dated September 22, 2020 (*see* Attachment C), includes the statement “[a]s a protection to its customers for unusual spikes in treatment costs, Synergy caps DPU’s treatment costs at 400 gallons per day per month.” In regard to this protection afforded to the customers in Northwood:

- a. Identify any other service territory that receives a similar protection for unusual spikes in treatment costs.

None.

- b. Provide a copy of any Commission order or contractual agreement which dictates the protection provided to the customers in Northwood and any other protection identified in part a. above.

None.

- c. Will SCWU continue to provide this protection to the customers in Northwood and any other protection identified in part a. above?

Yes.

-Keith Pamell & Michael Cartin

Questions about Other Technical, Managerial, and Financial Topics

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³ PSC Order No. 2018-369; Section E; Page 11

[REDACTED]

1-68 [REDACTED]

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May 26, 2021

IN RE: Joint Application for Approval of)	SOUTH CAROLINA OFFICE OF
the Sale of Assets and Transfer of)	REGULATORY STAFF'S SECOND
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TO: CHARLES L.A. TERRENI, ESQUIRE AND SCOTT ELLIOTT, ESQUIRE,
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UTILITIES, INC.

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II. REQUESTS

Questions about SCWU and SouthWest Water Company ("SWWC")

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- 2-6 Follow up to AIR 1-20. Provide details of the existing debt instrument(s) to be used to fund to the asset acquisition. For each debt instrument, whether short-term or long-term debt, identify the current debt holder, issue date, maturity date, original principal amount, amount outstanding, and interest rate.

The debt funding used to close the transaction will be sourced from short-term intercompany advances from SWWC.

-Dan Medina

- 2-7 Follow up to AIR 1-20. Provide details of the source(s) of equity by type/category of equity to be used to fund the asset acquisition.

The equity funding used to close the transaction will be provided to SCWU in the form of common equity, contributed by SWWC to its immediate subsidiary, Southeast Utility Systems, Inc. and downstreamed via corollary equity contributions into SCWU. SWWC will source the equity funding from cash on hand.

-Dan Medina

- 2-8 Follow up to AIR 1-21. Given that no cost studies or cost analyses were performed as part of the acquisition, please provide quantifiable support for SCWU's statement that "SCWU believes that there can be improvements in reliability and resiliency with the acquisition." The response should highlight specific, quantifiable aspects of Synergy's existing

reliability and resiliency relative to the improvements in reliability and resiliency to be implemented by SCWU.

Current Synergy owner, Keith Parnell, is the only current Synergy employee with the proper wastewater operator's license to operate the Bush River and Raintree WWTPs. Synergy has only one other employee who is a licensed professional engineer, Ken Parnell, who works in a limited capacity for the company. If for any reason Keith Parnell was not able to be on-site handling the daily operation and maintenance required of Synergy's wastewater systems, Synergy would have to search for assistance elsewhere to ensure compliance of treatment plants and responsiveness to customer emergencies. SCWU has the ability to provide the additional human resources necessary to operate these treatment facilities and respond to customer's needs. This would provide improvements in reliability and resiliency within Synergy's systems.

Being part of a company that operates nationally, SCWU has access to resources otherwise unavailable. Though it is not anticipated at this time, should a natural disaster occur, SCWU would be able to respond in a timely, cost-efficient manner. By way of example, when severe flooding hit southeast Texas in 2017 following Hurricane Harvey, many customers were affected. The local customer call center was unable to open, but SouthWest rerouted customer calls to the call center of another subsidiary in California. Another example of resiliency and reliability being improved through affiliate relationships occurred when severe winter storms hit Texas in 2021, resulting in freezing temperatures, frozen roads, and power blackouts. Teams of operators from all over the country descended on Texas to help fix leaks and stabilize water systems. In both of the above instances, the local utility's ability to draw resources from a larger organization resulted in benefits to customers.

-Michael Cartin

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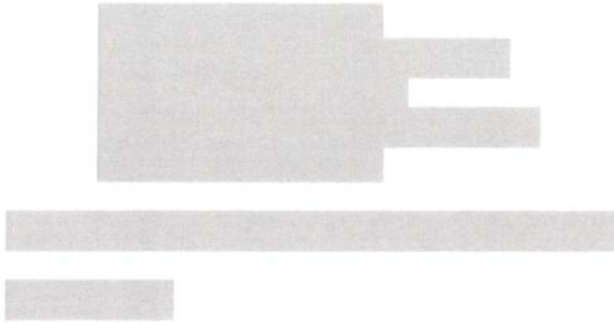
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September 6, 2021